

{In Archive} Re: Follow up on previous question regarding PCB detection in washwater wastewaters

Molly Finn to: Deborah Denfeld

01/11/2011 05:09 PM

Cc: Amy Hensley

Archive: This message is being viewed in an archive.

Hi Deborah,

I have looked through your questions regarding wash-water resulting from the power washing of the floor space and concrete pad. The wash-water from the 50 ppm solids is considered a TSCA waste. Water less than 3 ug/L PCBs can be discharged to a treatment works or to navigable waters, and water less than or equal to 0.5 ug/L is unrestricted in its use (see 40 CFR 761.79(b)(1)). Additionally, section 761.50(a)(3) states that no person may discharge water containing PCBs to a treatment works or to navigable waters unless the PCB concentration is less than 3 ug/L or through a permit under the Clean Water Act. The water does not need to be incinerated at this low of a concentration.

I hope this answers your questions. Let me know if you have any additional questions.

Thanks.

Molly Finn Environmental Engineer Cleanup Programs Branch U.S. EPA 703-347-8785

Deborah Denfeld Molly, We talked briefly on Tuesday morning re... 01/06/2011 01:34:43 PM

From: Deborah Denfeld < DDenfeld@fando.com>

To: Molly Finn/DC/USEPA/US@EPA

Date: 01/06/2011 01:34 PM

Subject: Follow up on previous question regarding PCB detection in washwater wastewaters

Molly,

We talked briefly on Tuesday morning regarding my question below, and I wanted to follow up with another question:

Scenario as we discussed:

We are assisting a client with remediation of an interior building floor space and an exterior concrete pad, with a two step cleaning process:

First: Removing the solids debris by sweeping and collection

Second: Power washing and collection of wash waters (in temporary storage)

An analysis of the solids debris indicated a PCB detection of 50 mg/kg of Arochlor 1254.

(We have since handled the removal of the PCB solids)

An analysis of the wash-waters indicated a PCB Detection of 1.7 ug/l of Arochlor 1254 (A total quantity of about 6,000 gallons)

Two questions regarding the remediation wash-waters

- Q1. Whether or not I would characterize the wash-waters as TSCA or non-TSCA?
- Q2. Whether or not a Notification to EPA is required?
- Q3. Will EPA grant a written authorization that we can manage the wash-waters under the remediation regulations in lieu of the TSCA regulations (and avoid the incineration of the liquids)?

Looking forward to hearing from you at your earliest convenience. Please call me to discuss Thank you



Deborah Denfeld Senior Environmental Engineer

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